

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**ELANDER WOODALL, Individually and
on Behalf of All Others Similarly Situated,**

Plaintiff,

v.

**EVERGREEN PACKAGING, LLC AND
PACTIV EVERGREEN, INC.,**

Defendants.

Case No. 1:23-CV-459

Honorable Steven C. Seeger

**JOINT MOTION FOR APPROVAL OF FAIR LABOR STANDARDS ACT
SETTLEMENT**

Plaintiff, Elander Woodall (“Plaintiff” or “Named Plaintiff”), individually and on behalf of all others similarly situated (the “Settlement Collective Members”), and Defendants Evergreen Packaging LLC and Pactiv Evergreen Inc. (“Defendants”) (collectively the “Parties”), jointly move for a finding that the Settlement Agreement attached as “Exhibit 1” is fair and reasonable and for final approval, and for final certification of the Fair Labor Standards Act collective action for settlement purposes. In support of this Joint Motion, the Parties file the following memorandum of law contemporaneously herewith.

WHEREFORE, for the reasons stated in the Parties Memorandum of Law, the Parties urge this Court to: (i) grant final approval of the Parties’ Settlement Agreement pursuant to the Fair Labor Standards Act, a true and correct copy of which is attached as Exhibit 1 to this Motion, as a fair and reasonable resolution of a bona fide dispute and in the best interests of the Settlement Collective Members, who will each be able to choose whether or not to participate in the Settlement, and therefore release their claims; (ii) certify the Settlement Collective Members as a collective in this case for settlement purposes only under Section 216(b) of the FLSA; (iii) appoint

Named Plaintiff as the representative of the Settlement Collective and approve the proposed Service and General Release Award; (iv) approve the issuance of the proposed Notice Packet (as set forth in the Settlement Agreement); (v) dismiss the Litigation on the merits and with prejudice pursuant to the terms of the Settlement Agreement, and grant final judgment; and (vi) retain jurisdiction to oversee and enforce the Settlement Agreement.

Dated: April 21, 2025

Respectfully submitted,

Elander Woodall

/s/ Josh Sanford

One of Her Attorneys

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Respectfully submitted,

Evergreen Packaging LLC and Pactiv Evergreen Inc.

/s/ John A. Ybarra

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